

Safety Evaluation Number<sup>1</sup>: SE-W375-00-00012 Revision No: 0

ABCN-W375-00-00015 and ABCN-  
ABCN Number: W375-00-0010

Safety Evaluation Subject: Selection of Quality Assurance Implementing Standard

## **PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE**

1. Describe the proposed revision (including credible failure modes, if applicable).

Replace the citations to various ISMP sections as implementing standards for SRD Safety Criteria 7.3-1 through 7.3-11 with the applicable sections of DOE G-830.120-REV. 0, *Implementation Guide for use with 10 CFR Part 830.120, Quality Assurance*, April 15, 1994, as tailored for RPP-WTP.

Delete the citation to ISMP section 3.3.3 as the implementing standard for SRD Safety Criterion 7.3-12.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The affected AB documents are the SRD, ISMP and QAPIP (see References section).

The changes to the SRD are as noted in section 1 above. Tailoring of the new implementing standard, DOE G-830.120-REV. 0, will be defined in a new section of SRD Vol. II Appendix C.

The following ISMP sections are affected: 1.3.9, 1.3.11, 2.2, 3.15, 3.3.3, 5.4, 8.0, 10.0. No changes to the ISMP are being made by this revision; however, these sections will no longer be cited as implementing standards for quality assurance.

The QAPIP is not being changed by this revision; however, since the QAPIP was written using DOE G-830.120-REV. 0 as a guide, it is related to the subject matter of the revision.

3. List the references used for the safety evaluation.

- BNFL-5193-ISP-01, Rev. 4b, November 9, 1999, *Integrated Safety Management Plan*, BNFL Inc., Richland, Washington
- BNFL-5193-SRD-01, Rev. 2e, January 18, 2000, *Safety Requirements Document*, BNFL Inc., Richland, Washington
- BNFL-5193-QAP-01, Rev. 5, *Quality Assurance Program and Implementation Plan*, BNFL Inc., Richland, Washington (to be issued upon approval of ABAR-W375-00-00010)
- 10 CFR Part 830.120, *Quality Assurance Requirements*
- DOE G-830.120-REV. 0, *Implementation Guide for use with 10 CFR Part 830.120, Quality Assurance*, April 15, 1994

4. Describe the planned revision implementation schedule.

The change will be incorporated into the SRD within 30 days of receipt of RU approval.

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<sup>1</sup> The Safety Evaluation Number shall be obtained from Project Document Control.

## PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- |   | <u>YES</u>                          | <u>NO</u>                |
|---|-------------------------------------|--------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

JUSTIFICATION:

**The revisions replace the citations to various ISMP sections as implementing standards for SRD Safety Criteria 7.3-1 through 7.3-11 with the applicable sections of DOE G-830.120-REV. 0, as tailored for RPP-WTP.**

**Delete the citation to ISMP section 3.3.3 as the implementing standard for SRD Safety Criterion 7.3-12.**

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

JUSTIFICATION:

**Citation of a new implementing standard does not result in a reduction in commitment currently described in the AB. The affected ISMP sections (listed above) are not being deleted by this change. The deletion of ISMP section 3.3.3 as the implementing standard for Safety Criterion 7.3-12 does not represent a reduction in commitment, because ISMP § 3.3.3 did not amplify the requirements of the Safety Criterion or provide additional direction on the annual QAP update. The Safety Criterion is a standalone statement that needs no amplification; hence an implementing standard is unnecessary, as described in section 3.2.3.1.6 of RL/REG-98-01.**

- |   |                          |                                     |
|---|--------------------------|-------------------------------------|
| 3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

JUSTIFICATION:

**This change does not alter the quality assurance program described in the QAPIP. The QAPIP was developed using DOE G-830.120-REV. 0 as a guide.**

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

## PART III: SAFETY EVALUATION CONCLUSION

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

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Evaluator/Originator

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Date

# Safety Evaluation

Safety Evaluation Number<sup>1</sup>: SE-W375-00-00012 Revision No: 0

ABCN-W375-00-00015 and ABCN-  
ABCN Number: W375-00-0010

Safety Evaluation Subject: Selection of Quality Assurance Implementing Standard

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Reviewer<sup>2</sup>

\_\_\_\_\_  
Date

\_\_\_\_\_  
Radiation Safety and Regulatory Manager

\_\_\_\_\_  
Date

\_\_\_\_\_  
Chair, Project Safety Committee<sup>3</sup>

\_\_\_\_\_  
Date

\_\_\_\_\_  
RPP-WTP General Manager<sup>3</sup>

\_\_\_\_\_  
Date

<sup>2</sup> The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

<sup>3</sup> This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.